VERMONT

Agency of Transportation
Asset Management and Planning Bureau
219 N. Main St., Barre, VT 05641
vtrans.vermont.gov

Brooke Dingledine
State of Vermont Land Use Review Board
10 Baldwin Street
Montpelier, Vermont 05633

August 6, 2026

Re: **VTrans Comments on Central Vermont Regional Commission's Draft Plan**

Dear Ms. Dingledine,

On behalf of the Agency of Transportation, attached please find the Agency's comment on the Central Vermont Regional Planning Commission's (CVRPC) draft regional plan as part of LURB's preapplication review process. The Agency's review focused on assessing the required elements of the transportation section within the regional plan and analyzing the Future Land Use Areas (FLUA) impacts on state transportation assets.

The plan is detailed, well-crafted, and thoughtfully integrates community perspectives to advance the State's planning goals. Additional Agency comments can be found in the enclosed comment form. As context pertinent to all Regional Plan and FLUA reviews, please note the following:

- The statutory benefit outlined in 24 V.S.A. § 5803 for Downtowns and Village Centers and Designated Neighborhoods to reduce speed limits below 25 mph does not extend to roadways under state jurisdiction. The Agency's Traffic Committee process to change speed limits on these roadways still applies.

- The Agency has developed Complete Streets Guidance (2023) that informs the design of roadways under state jurisdiction; a training module for municipalities is also currently being deployed across the State. The Agency is also currently updating the Vermont State Standards for road design, with a focus on proposing proven safety countermeasures that respond to adjacent land use contexts – a process which the Agency continues with the FLUA process. Both documents will serve as important resources for continued alignment of complete streets elements design and implementation in Downtowns and Village Centers and Planned Growth Areas.

- As required in Part C, Goal 4 of the FLUA maps, RPC transportation plans should provide indications of priorities of needs, costs, and methods of financing of future needs. The Agency notes that such priorities should continue to be identified for the VTrans Project Selection and Prioritization Process (VPSP2), and, additionally, that when funding for these priorities is required, local and regional resources and partners will be imperative given current budgetary constraints.

While the Tier 1 exemptions from the Act 250 process have distinct advantages for development projects, these exemptions limit the Agency's ability to review and guide the design of transportation infrastructure, particularly within Act 250 exempted areas if the developments are not adjacent to state roads. These exemptions also have implications for the Act 145 transportation impact fee, which is linked to Act 250 and creates fair share fee a development pays to state intersection improvements in the region that add capacity to the roadway network. These improvements accommodate the added traffic of the developments and aid in preventing the "last one in pays" scenario in some of these areas. A recent legislative study addresses the issue of the Act 145 transportation impact fee within the realms of Act 181 and the Act 250 exemptions. The results of the study may yield other ideas on the assessment of Act 145 fair share fees in these Act 250 exempt areas.

The Agency remains committed to the framework established under ACT 181 and looks forward to continued collaboration with the Land Use Review Board.

Sincerely,

Christopher D. Clow

Christopher G. Clow, PE
Transportation Engineer
802-522-4901 phone | christopher.clow@vermont.gov

cc: Ken Valentine, Asset Management and Planning Bureau Director
Dave Pelletier, Manager of Planning and Development Review
Matthew Arancio, Regional Planning Manager